

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 20 -
v.	:	DATE FILED: November 24, 2020
CHRISTIAN S. DUNBAR	:	VIOLATIONS:
	:	18 U.S.C. § 656 (bank embezzlement by
	:	bank employee - 3 counts)
	:	18 U.S.C. § 1425(a) (procurement of
	:	naturalization through a false statement -
	:	1 count)
	:	18 U.S.C. § 1425(b) (procurement of
	:	naturalization unlawfully - 1 count)
	:	18 U.S.C. § 1426(b) (false citizenship
	:	papers - 2 counts)
	:	18 U.S.C. § 1015 (false statement in
	:	support of naturalization - 7 counts)
	:	Notice of forfeiture

INDICTMENT

COUNTS ONE THROUGH THREE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. Wells Fargo Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation.
2. Defendant CHRISTIAN S. DUNBAR was an employee at Wells Fargo Bank at the Newtown Square branch located at 3515 West Chester Pike, Newtown Square, Pennsylvania. His job title was Private Banker.
3. J.H., known to the grand jury, was an account holder at Wells Fargo Bank.
4. W.D., known to the grand jury, was an account holder at Wells Fargo Bank.

5. On or about the dates listed below, each date constituting a separate offense, in the Eastern District of Pennsylvania, defendant

CHRISTIAN S. DUNBAR,

while being an employee, that is, a Private Banker, of Wells Fargo Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, knowingly embezzled, abstracted, purloined, and willfully misapplied moneys and funds of, and intrusted to the custody and care of, Wells Fargo Bank, as described below.

<u>Count</u>	<u>On or About Date</u>	<u>Amount</u>	<u>Nature of Unauthorized Transaction</u>
One	December 17, 2015	\$5,000.00	Withdrawal from J.H. account #xxxxxx2124
Two	December 28, 2015	\$5,000.00	Withdrawal from W.D. account #xxxxxx3118
Three	January 7, 2016	\$5,000.00	Withdrawal from W.D. account #xxxxxx3118

All in violation of Title 18, United States Code, Section 656.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

From on or about July 7, 2015 through on or about January 8, 2016, in the Eastern District of Pennsylvania, defendant

CHRISTIAN S. DUNBAR

knowingly procured, contrary to law, naturalization as a United States citizen for himself, by making in connection with his application for naturalization knowingly false representations and statements on his Form N-400, Application for Naturalization, Form N-445, Notice of Naturalization Oath Ceremony, and in sworn statements to immigration and naturalization officials, that:

a. he had lived in marital union with his United States citizen spouse, a person known to the grand jury, at 243 Bainbridge Street in Philadelphia, Pennsylvania, for the three years immediately preceding the filing of his N-400, Application for Naturalization, that is, from July 8, 2012 through July 7, 2015, when in fact, as defendant DUNBAR knew, these representations and statements were false based on the fact he was cohabitating with F.N.D., known to the grand jury, at the addresses of 4530 and 4930 Sansom Street in Philadelphia, Pennsylvania during that period of time.

b. he had not committed, assisted in committing, or attempted to commit a crime or offense for which he had not been arrested, when in fact, as defendant DUNBAR knew, these representations and statements were false based on his crimes committed beginning on or about December 17, 2015 through at least on or about January 8, 2016, that is, embezzlement by a bank employee, in violation of 18 U.S.C. § 656.

In violation of Title 18, United States Code, Section 1425(a).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

From on or about July 7, 2015 through on or about January 8, 2016, in the Eastern District of Pennsylvania, defendant

CHRISTIAN S. DUNBAR

knowingly procured, obtained and applied for naturalization as a United States citizen for himself, to which he was not entitled, because at the of time of his application for naturalization:

a. defendant DUNBAR could not satisfy the requirements for naturalization, pursuant to Title 8, United States Code, Section 1427, in that he was not a person of “good moral character,” given that he provided false statements and representations for the purpose of obtaining any benefits under Chapter 12 of Title 8 of the United States Code, as set forth and charged in Counts Eight through Fourteen of this Indictment;

b. defendant DUNBAR could not satisfy the requirements for naturalization, pursuant to Title 8, United States Code, Section 1427, in that he was not a person of “good moral character,” given that before he certified Form N-445, the Notice of Naturalization Oath Ceremony, on or about January 8, 2016, he had committed the crime of embezzlement by a bank employee in December 2015 and January 2016 as alleged in Counts One, Two, and Three; and

c. defendant DUNBAR could not satisfy the requirements for naturalization, pursuant to Title 8, United States Code, Section 1430(a), in that he was not living in marital union with his United States citizen spouse for the three years immediately preceding the filing of his N-400, Application for Naturalization.

In violation of Title 18, United States Code, Section 1425(b).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 21, 2015, in the Eastern District of Pennsylvania,
defendant

CHRISTIAN S. DUNBAR

knowingly used as true and genuine a purported 2011 lease for 243 Bainbridge Street in Philadelphia, Pennsylvania, that was required by law relating to his application for naturalization by submitting this lease to immigration and naturalization officials, knowing the lease was false, forged, altered, antedated and counterfeited.

In violation of Title 18, United States Code, Section 1426(b).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 21, 2015, in the Eastern District of Pennsylvania,
defendant

CHRISTIAN S. DUNBAR

knowingly used as true and genuine, a Form W-2, Wage and Tax Statement, purportedly issued by Wells Fargo Bank that was required by law relating to his application for naturalization by submitting this W-2 to immigration and naturalization officials, knowing this Form W-2 was false, forged, altered, antedated and counterfeited.

In violation of Title 18, United States Code, Section 1426(b).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 21, 2015, in the Eastern District of Pennsylvania, defendant

CHRISTIAN S. DUNBAR

knowingly made a false statement under oath in a proceeding and matter relating to naturalization, citizenship, and registry of aliens, in that in his Form N-400, Application for Naturalization, defendant DUNBAR stated under oath according to Part 1, Question 2, that he had been married to and living with the same United States citizen spouse for the last three years and his spouse had been a United States citizen for the last three years at the time of filing his N-400, when in fact, as defendant DUNBAR knew, the statement was false and fictitious.

In violation of Title 18, United States Code, Section 1015(a).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 21, 2015, in the Eastern District of Pennsylvania, defendant

CHRISTIAN S. DUNBAR

knowingly made a false statement under oath in a proceeding and matter relating to naturalization, citizenship, and registry of aliens, in that in his Form N-400, Application for Naturalization, defendant DUNBAR stated under oath according to Part 4, Question 1, that from December 10, 2011 to October 21, 2015 he had lived at 243 Bainbridge Street, Philadelphia, Pennsylvania, when in fact, as defendant DUNBAR knew, the statement was false and fictitious.

In violation of Title 18, United States Code, Section 1015(a).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 21, 2015, in the Eastern District of Pennsylvania, defendant

CHRISTIAN S. DUNBAR

knowingly made a false statement under oath in a proceeding and matter relating to naturalization, citizenship, and registry of aliens, in that in his Form N-400, Application for Naturalization, defendant DUNBAR stated under oath according to Part 9, Question 1, that his marital status to his United States citizen spouse, a person known to the grand jury, was “married” and not “separated,” when in fact, as defendant DUNBAR knew, the statement was false and fictitious.

In violation of Title 18, United States Code, Section 1015(a).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 21, 2015, in the Eastern District of Pennsylvania, defendant

CHRISTIAN S. DUNBAR

knowingly made a false statement under oath in a proceeding and matter relating to naturalization, citizenship, and registry of aliens, in that in his Form N-400, Application for Naturalization, defendant DUNBAR stated under oath according to Part 10, Question A.5, that his child, A.D., known to the grand jury, resided at 243 Bainbridge Street, Philadelphia, Pennsylvania, when in fact, as defendant DUNBAR knew, the statement was false and fictitious.

In violation of Title 18, United States Code, Section 1015(a).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 21, 2015, in the Eastern District of Pennsylvania, defendant

CHRISTIAN S. DUNBAR

knowingly made a false statement under oath in a proceeding and matter relating to naturalization, citizenship, and registry of aliens, in that in his Form N-400, Application for Naturalization, defendant DUNBAR stated under oath according to Part 11, Question 31, that he had not ever given any U.S. Government official any information or documentation that was false, fraudulent, or misleading, when in fact, as defendant DUNBAR knew, the statement was false and fictitious.

In violation of Title 18, United States Code, Section 1015(a).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 21, 2015, in the Eastern District of Pennsylvania, defendant

CHRISTIAN S. DUNBAR

knowingly made a false statement under oath in a proceeding and matter relating to naturalization, citizenship, and registry of aliens, in that in his Form N-400, Application for Naturalization, defendant DUNBAR stated under oath according to Part 11, Question 32, that he had not ever lied to any United States Government official to gain entry or admission into the United States or to gain immigration benefits while in the United States, when in fact, as defendant DUNBAR knew, the statement was false and fictitious.

In violation of Title 18, United States Code, Section 1015(a).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 8, 2016, in the Eastern District of Pennsylvania, defendant

CHRISTIAN S. DUNBAR

knowingly made a false statement under oath in a proceeding and matter relating to naturalization, citizenship, and registry of aliens, in that in his Form N-445, Notice of Naturalization Oath Ceremony, defendant DUNBAR stated in response to question 3 that he had not committed any crime or offense, for which he had not been arrested, when in fact, as defendant DUNBAR knew, the statement was false and fictitious.

In violation of Title 18, United States Code, Section 1015(a).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As the result of the violation of Title 18, United States Code, Section 656, as charged in Count One, defendant

CHRISTIAN S. DUNBAR

shall forfeit to the United States any and all property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such violation, including, but not limited to the sum of \$15,000.

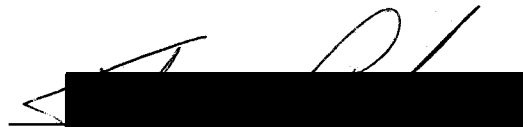
2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,


it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

All pursuant to Title 18, United States Code, Section 982(a)(2).

A TRUE BILL:

A handwritten signature in black ink, appearing to be "A. P.", is written over a solid black rectangular redaction box.

GRAND JURY FOREPERSON

A large, stylized handwritten signature in black ink, appearing to be "W. M. McSwain", is written over a solid black rectangular redaction box.

WILLIAM M. McSWAIN
UNITED STATES ATTORNEY

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

CHRISTIAN DUNBAR

INDICTMENT

Counts

- 18 U.S.C. § 656 (bank embezzlement by bank employee - 3 counts)
18 U.S.C. § 1425(a) (procurement of naturalization through a false statement - 1 count)
18 U.S.C. § 1425(b) (procurement of naturalization unlawfully - 1 count)
18 U.S.C. § 1426(b) (false citizenship papers - 2 counts)
18 U.S.C. § 1015 (false statement in support of naturalization - 7 counts)

Notice of forfeiture

Foreman

Filed in open court this _____ day,
Of _____ A.D. 20 _____

Clerk

Bail, \$ _____
